

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to: *All Actions*

**DECLARATION OF ROBERT T. HAEFELE IN SUPPORT OF PLAINTIFFS’
EXECUTIVE COMMITTEES’ OPPOSITION
TO THE MOTION OF MARTIN MCMAHON TO
WITHDRAW AS COUNSEL FOR DEFENDANT WA’EL JELAIDAN**

Robert T. Haeefele affirms, under penalty of perjury, as follows:

1. I am an attorney admitted to practice in the above-captioned matter, a member of the Plaintiffs’ Executive Committees in this MDL, and associated with the law firm Motley Rice LLC, counsel for plaintiffs in this MDL. I submit this Declaration to transmit to the Court the following documents, which are being submitted in support of Plaintiffs’ Executive Committees’ Opposition to the Motion of Martin McMahon to Withdraw as Counsel for Defendant Wa’el Jelaidan.

2. Attached hereto as Exhibit A is a true and correct copy of pages 32-43 of the Transcript of the March 19, 2013 hearing before U.S. Magistrate Judge Frank Maas.

3. Attached hereto as Exhibit B is a true and correct copy of pages 7-8 of the Transcript of the June 23, 2011 hearing before U.S. Magistrate Judge Frank Maas.

4. Attached hereto as Exhibit C is a true and correct copy of pages 24-25 of the Transcript of the July 13, 2011 hearing before U.S. Magistrate Judge Frank Maas.

5. Attached hereto as Exhibit D is a true and correct copy of a series of documents produced in discovery by defendant Sana-Bell/Sanabel al Kheer, and includes the documents bates stamped Sana-Bell 000446-447, 454, and 659-660.

Executed in Mount Pleasant, South Carolina, on May 11, 2018.

A handwritten signature in black ink, appearing to read "R. Haeefe", written over a horizontal line.

/s/

Robert T. Haeefe, Esq.